

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 1:19-04767
JEREMY L. BRININGER	: Chapter 13
	:
Debtor	:
	:
LAKEVIEW LOAN SERVICING	:
Movant	:
vs.	:
	:
JEREMY L. BRININGER	:
Debtor/Respondent	:

**ANSWER TO MOTION FOR RELIEF FROM STAY**

AND NOW, comes the Debtor, Jeremy I. Brininger, by and through his attorney, James H. Turner, Esquire and Answers the Motion for Relief from Stay filed by LAKEVIEW LOAN SERVICING as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted. By further answer, debtor is aware of the arrearage and would like to cure it by doing a six month stipulation.
7. Admitted.
8. Denied. This is a conclusion of law to which no responsive pleading is necessary.

9. Admitted and denied. It is admitted that Movant incurred legal fees and costs, however Debtor feels the amount stated is exorbitant.

10. Admitted.

WHEREFORE, Debtor/Respondent requests this Honorable Court deny the Movant's Motion for Relief From Stay and schedule a hearing on this matter at the Court's earliest possible convenience.

Respectfully submitted,  
/s/ James H. Turner  
James H. Turner  
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**CERTIFICATE OF SERVICE**

I, James H. Turner, hereby certify that I served a true and correct copy of the foregoing by depositing a true and correct copy in the U.S. mail, first class postage prepaid, addressed, or e-mail as follows:

Charles J. DeHart III, Esquire  
8125 Adams Drive  
Suite A  
Hummelstown, PA 17036

James C. Warmbrodt, Esquire  
KML Law Group PC  
Suite 5000 – BNY Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532

Date: 3/4/20

/s/ James H. Turner  
James H. Turner